

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD ZEITLIN,

Defendant.

23-cr-419 (LAK)

**DEFENDANT’S NOTICE OF MOTION FOR AN ORDER PROHIBITING
DISCLOSURE OF THE DEFENSE PRIVILEGE LIST AND
REQUIRING DISCLOSURE OF FILTER TEAM PROTOCOLS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum, Defendant Richard Zeitlin hereby moves through his counsel for an order prohibiting the government’s filter team from disclosing a defense privilege list to the prosecution team in this case. Furthermore, Mr. Zeitlin hereby moves for an order requiring the government to provide additional specific information about the filter team’s composition and protocols.

Dated: November 14, 2023.

THE BERNHOFT LAW FIRM, S.C.
Attorneys for Defendant Richard Zeitlin

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